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Attorneys for Defendant OLEG TINKOV

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) NO. CR 19-00489 JST  
Plaintiff, )  
) **STIPULATION AND [PROPOSED] ORDER**  
) **RE: FORWARDING RESTITUTION FROM**  
) **CLERK OF COURT TO INTERNAL**  
) **REVENUE SERVICE**  
v. )  
OLEG TINKOV ) Sentencing date: October 29, 2021  
A/K/A/ OLEG TINKOFF, ) Time: 9:30 a.m.  
Defendant. ) Via Zoom

Defendant Oleg Tinkov, by and through his retained counsel, the United States Attorney's Office for the Northern District of California, by and through Assistant United States Attorney Michelle J.

STIP. & [PROPOSED] ORDER RE RESTITUTION  
CR-19-00489 JST

1 Kane, and the United States Department of Justice, Tax Division, by and through Trial Attorney Peter  
2 Anthony, hereby stipulate and agree to the following:

3       1. In the Plea Agreement signed on September 2, 2021, and filed on October 1, 2021 (ECF  
4 No. 25), defendant Tinkov agreed that, prior to the date of sentencing, he would pay restitution to the  
5 Internal Revenue Service (IRS) in the amount of \$448,957,108 by depositing those funds with the Clerk  
6 of the District Court, to be forwarded to the IRS at the following address: IRS-RACS, Attn: Mail Stop  
7 6261, Restitution, 333 W. Pershing Ave., Kansas City, MO, 64108.

8       2. On October 6, 2021, the parties jointly requested that the Court issue an order authorizing  
9 the Clerk to accept defendant's restitution payment prior to sentencing. (ECF No. 32.) The Court issued  
10 that requested order the next day. (ECF No. 34.)

11       3.      On October 8, 2021, the Clerk received defendant's restitution payment in the amount of  
12 \$448,957,108. (ECF No. 36.)

13       4. The parties have been informed that, in the ordinary course, the Clerk does not disburse  
14 restitution funds until there is a judgment in the case, but that it can do so before the judgment is entered  
15 pursuant to a court order.

16       5.      The parties now jointly request that the Court issue an order directing the Clerk to  
17 transmit defendant's restitution payment to the IRS forthwith by forwarding the payment, together with  
18 any and all accrued interest, to the IRS at the following address: IRS-RACS, Attn: Mail Stop 6261,  
19 Restitution, 333 W. Pershing Ave., Kansas City, MO, 64108, with a notation reflecting the defendant's  
20 name and docket number.

## IT IS SO STIPULATED.

STEPHANIE M. HINDS  
Acting United States Attorney

Dated: 10/14/2021

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/s/  
MICHELLE J. KANE  
Assistant United States Attorney

1 Dated: 10/14/2021

/s/  
PETER ANTHONY  
Trial Attorney  
U.S. Department of Justice, Tax Division

4 Dated: 10/14/2021

/s/  
JEREMY H. TEMKIN, Esq.  
Pro Hac Vice  
Attorney for Defendant

7 Dated: 10/14/2021

/s/  
CHRISTOPHER MORVILLO, Esq.  
Pro Hac Vice  
Attorney for Defendant

10 Dated: 10/14/2021

/s/  
ISMAIL RAMSEY, Esq.  
Attorney for Defendant

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1                   **[PROPOSED] ORDER**

2       The Court, having considered the Stipulation Regarding Forwarding Restitution from the Clerk  
3 of Court to the Internal Revenue Service, the Stipulation having been executed by the United States and  
4 defendant's counsel, and good cause appearing, hereby ORDERS as follows:

5       1.      The Stipulation is approved; and

6       2.      The Clerk of Court for the Northern District of California, having received and accepted  
7 from the defendant a restitution payment in the amount of \$448,957,108, shall transmit that payment to  
8 the IRS forthwith by forwarding the funds, together with any and all accrued interest, to the IRS at the  
9 following address: IRS-RACS, Attn: Mail Stop 6261, Restitution, 333 W. Pershing Ave., Kansas City,  
10 MO, 64108, with a notation reflecting the defendant's name and docket number.

11                  IT IS SO ORDERED.

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13 DATED:\_\_\_\_\_

14                  \_\_\_\_\_  
15                  HON. JON S. TIGAR  
16                  United States District Judge

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